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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
ISO OTTO TRUCKING LLC'S
OPPOSITION TO PLAINTIFF'S MOTION
IN LIMINE NO. 16**

Hearing Date: September 20, 2017

Hearing Time: 8:00 a.m.

Courtroom: 8 (19th Floor)

Judge: The Honorable William Alsup

Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Opposition

2. Gruver Declaration

DECLARATION OF NEEL CHATTERJEE

I, I. Neel Chatterjee, declare as follows:

1. I am an attorney admitted to practice before this Court. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for the Defendant Otto Trucking LLC (“Otto Trucking”) in the above entitled action. Except where noted herein, I have personal knowledge of the matters stated herein and, if called upon, could and would competently testify thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the LinkedIn profile of Seval Oz.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of Plaintiff Waymo’s Supplemental Objections and Responses to Otto Trucking LLC’s Interrogatory Nos. 1-9 dated August 24, 2017.

4. Attached hereto as **Exhibit 3** is a true and correct copy of an email sent by Hong-An Vu to counsel of record for all parties dated August 10, 2017.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an email sent by Hong-An Vu to counsel of record for all parties dated August 12, 2017.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the deposition of Michael Xing dated August 17, 2017.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the deposition of Dmitri Dolgov dated August 8, 2017.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of Otto Trucking LLC’s 30(b)(6) deposition of Pierre Yves-Droz dated August 22, 2017.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 13th day of September, 2017 at Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee

PROOF OF SERVICE

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is: Three Embarcadero Street, 28th Floor, San Francisco, California 94111.

On **September 13, 2017**, I electronically served the following document, and all attachments thereto, on the persons below as follows:

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OPPOSITION TO PLAINTIFF'S MOTION *IN LIMINE* NO. 16**

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☐ (MAIL). I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

☐ (OVERNIGHT DELIVERY). I deposited in a box or other facility regularly maintained by FedEx, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for.

☒ (E-MAIL or ELECTRONIC TRANSMISSION). Based on a court order or *an agreement of the parties to accept service by e-mail or electronic transmission*, I caused the documents to be sent to the persons at the e-mail addresses listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **September 13, 2017**, at San Francisco, California.

Hayes P. Hyde
(Type or print name)

/s/ Hayes P. Hyde
(Signature)